CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following Special Initial Study for this project in accordance with the California Environmental Quality Act (§ 21000 et seq., California Public Resources Code) and implementing Guidelines (§15000 et seq., Title 14, California Code of Regulations). This Special Initial Study has also been used to satisfy the requirements of 7711.4, Fish and Game Code and 753.5, Title 14, Code of California Regulations relating to filing of environmental fees.

I. PROJECT INFORMATION

Project Name: Investigation and removal of Unexploded Ordnance (UXO) at Camp Ibis.

Site Location:

The former Camp Ibis (Camp) is located in San Bernardino County, California approximately 20 miles northwest of Needles, California (Figure 2.1). The Camp is situated between the Homer Mountains on the west and the Dead Mountains on the east. U.S. Highway 95 passes through the western side of the Camp. The Camp is located within T10N, R20E, Section 13c; T10N, R21E, Sections 4-9, 16-19, 21; T11N, R20E, Sections 20, 21, 28, 29, 32, 33. The project area consists of transects and grids in Areas A, B, and C, which have been identified as Areas of Interest. The approximately 50' wide transects and 100' x 100' grids equal 100 acres, which are distributed over the 13,398 acres of Camp Ibis. A general layout map of the Camp is provided on Figure 2.4. The land use is currently open space and the zoning is commercial/industrial.

Contact Person/ Address/ Phone Number: Department of the Army

United States Army Corps of Engineers

Los Angeles District

911 Wilshire Boulevard, Suite 15018 Los Angeles, California 90017-3401

Contact: Ms. Tawny Tran Phone Number: (213) 452-3991

Project Description:

The United States Army Corps of Engineers (ACOE) proposes to conduct a soil investigation, a geophysical survey that will characterize OE concentration and location, and a non-time critical removal action at Camp Ibis, a Formerly Used Defense Site (FUDS). Project activities include intrusive excavation of anomalies identified by the geophysical survey and may include demolition of OE. OE risk management actions will be implemented in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), Code of Federal Regulations, title 40, sections 300.410 and 300.415. In accordance with the NCP, on-site actions will not require Federal, State, or local permits; however, substantive permit requirements will be fulfilled. The proposed removal action is subject to the requirements of the California Health and Safety Code, chapter 6.8. Pursuant to the Public Resources Code, section 21067, the Department of Toxic Substances Control (DTSC), as the lead state regulatory agency is required to comply with the California Environmental Quality Act (CEQA).

The proposed engineering evaluation and cost analysis/interim removal action (EE/CA/IRA) includes:

- 1. Characterization of UXO concentrations and locations that may exist within approximately 13,398 acres comprising the former Camp;
- 2. Identification of potential safety problems associated with the UXO;
- 3. Risk management evaluation;
- 4. UXO detonation in-place if necessary; and
- 5. Evaluation and selection of alternatives for the site.

During the EE/CA/IRA, site characterization efforts involving a geophysical survey and intrusive sampling will be conducted to determine or classify those portions of the Camp that are contaminated or potentially contaminated with UXO and to estimate the type and density of UXO contamination. If surface ordnance is encountered during the geophysical survey and determined to be unsafe, it may be detonated in-place or moved to a consolidation area. However, the intent of this project is not to clear the area of UXO but to provide geophysical information so that a removal action can be designed to use resources more effectively. Precise delineation of a contaminated area, if present, as well as subsequent cleanup will be considered under a separate project after the EE/CA investigation is completed. The removal action that will clear the area of UXO will be performed according to CEQA and CERCLA.

Project Background:

The Camp Ibis training facility was used to train combat troops for desert warfare, to train service units and staff, and to test equipment, ammunition, weapon systems and supplies. The Camp operated from 1942-1944 to train various armor divisions. On March 16, 1944, the War Department declared Camp Ibis surplus. By September 1945 all property had been transferred to the original stakeholders that included the Department of Interior, Southern Pacific Company, State of California, and Atchison, Topeka and Santa Fe Railway. The ACOE performed surface sweeps to remove UXO until approximately 1954. However, in May 1964 the Camp was used to train the Desert Strike Force Team.

The type of practice and live ammunition used during training maneuvers were 37mm, 75mm, and 76mm high velocity projectiles and .30 and .50 caliber machine guns during training maneuvers. Other munitions used were 105mm howitzers; 3-inch, 40mm, 75mm, 90mm, 105mm, and 155mm projectiles; .45 caliber pistols/submachine guns; .30 caliber carbines and rifles; and Mark II fragmentation grenades. No uranium ammunitions or biological weapons tested or used at the Camp.

In September 1994, the ACOE prepared a Findings and Determination of Eligibility for the former Camp. The report determined that the Camp was formerly used by the Department of Defense and eligible for the Defense Environmental Restoration Program (DERP) for FUDS consideration. The report noted the establishment of deed restrictions (surface use only) on portions of the property (about 3,840 acres).

Environmental Setting:

The Camp is located within the Great Basin and sits in the Piute Valley between the Homer Mountains (west side) and the Dead Mountains (east side). The Camp is located within a large alluvial plain with both east and west areas gradually sloping up to their respective mountain ranges. The region encompassing the site is generally flat with rolling hills on both sides of the Piute Wash. The land use on the project site and the area surrounding the site is open space. Highway 95 traverses through the western portion of the project area. The Camp is located in the desert area of southern California and is sparsely covered with arid vegetation such as cacti. Very few trees exist on the project area.

No perennial surface water, lake, or wetland conditions are present on the project site. However, during heavy rains the small washes in the eastern portion of the Camp combine into the Piute Wash. The raging water travels at high speeds and causes tremendous erosion.

The average daily summer temperature exceeds 95 degrees Fahrenheit (F) with highs of 120 degrees F. Nightly temperatures may fall to upper 30's to lower 40's F. Fall temperatures average in the mid 70's to 80's F, while winter temperatures are in the 50's to 70's F. Spring temperatures range from the 70's to the mid 80's F.

Daily rainfall in the summer months, primarily July and August, averages 0.5 to 0.75 inches. Although, daily maximum rainfall may exceed 2.5 inches. Fall and winter average monthly rainfall is about 0.5 inches. Precipitation is minimal in the spring.

Geophysical Investigation:

During the first week of the field effort, geophysical equipment and personnel will be mobilized. Temporary recreational vehicles will serve as mobile offices, portable toilets and storage buildings. Additionally, due to the remoteness of the Camp, portable electric generators will be used, and communications will be via a combination of radios and cell phones.

Multiple geophysical teams will conduct surveys of the Camp grounds and will conduct intrusive excavations and soil sampling investigation. The separation distance of a minimum of 200 feet will be maintained between the geophysical survey teams. The UXO-Technician will provide visual clearance and UXO avoidance as well as assist in the geophysical survey operations.

The Health and Safety Plan will provide instructions for workers on standard work practices, hazard communication, UXO safety precautions, identification, handling, removal, transportation, and detonation. During the course of the geophysical survey field investigation, a survey may transect or a grid may overlap an environmentally sensitive area, a road, or other potentially interfering feature. The field teams will adjust survey locations to avoid such obstacles or get a Site Manager's approval with an onsite specialist recommendation to move or remove such obstacle.

Intrusive Investigation:

After the geophysical survey, the UXO team will reacquire anomalies. It is estimated that each team will excavate 200 anomalies per day or clear five acres per day per team. Each anomaly should require no more than a 2 x 2 x 2 feet excavation.

Although the anomaly count may be high, UXO specialists with experience at many former training facilities expect the average density of UXO for all portions of the Camp to be less than one item for every ten acres. A worst case scenario, in the judgement of UXO specialists, would be 1 item per two acres. However, expectation for the recovery of UXO during the investigation is zero to 3 or 4 items.

If the excavated material is considered to be UXO it shall be uncovered sufficiently to obtain a positive identification of the item. Only safe to move UXO items will be moved for consolidation. Transportation of safe to move UXO items within the site boundary will comply with all federal, state, and local regulations. Permits are not required under CERCLA for transportation of conventional UXO on-site or on federal installations. It is not anticipated that any UXO will need to be transported off-site.

An exclusion zone will be established to protect the non-essential project personnel and the public from intentional detonation and unintentional detonations. The Minimum Separation Distance (MSD) of 2577 feet is based on the most probable munition (a 155 mm projectile) for

Areas A, B, and C. If sampling conditions or site data warrant the ACOE, Engineering and Support Center, Huntsville may reduce the approved MSD to a distance based on one hazardous fragment per 600 square feet (447 feet). A reduction of the MSD to 220 feet may also be requested for implementation of engineering controls.

UXO removal will be comprised of a magnetometer screening and use of small earthmoving equipment to excavate overburden from suspected UXO to within 12 inches of the UXO. The excavation is typically a 2 x 2 x 2 feet in volume to provide access for UXO integrity and removal evaluation. Then, a trained UXO Technician will excavate the anomaly by hand.

Detonation in-place techniques will be used for all UXO items not safe to move. The demolition locations will be confined to the boundaries of each sub-area. Demolition sites will exist where UXO is found and detonated. The location of UXO, which must be detonated in place, cannot be predicted, and could occur at any point on the site. All UXO that are detonated in place will be well documented and the position indicated on the site map. All detonations will take place only after all nonessential personnel have left the area, and perimeter security has been posted. Electrical and non-electrical demolition disposal procedures will be utilized for the disposal of conventional ordnance. The non-electrical firing procedures are the most prudent means of initiating a demolition shot. All charges will be dual primed and initiated electrically. Detonating cord trunk and branch lines will be used to link multiple shots. Explosive booster will be used for the disposal of all UXO. Jet perforators can be used for the purpose of venting inert UXO scrap, if needed.

During the consolidated demolition shot, sandbags will be used to mitigate the fragments in accordance with the Department of Defense Explosives Safety Board. No UXO will be left unattended at any time. ACOE will track all detonations by location and munition and provide DTSC with this information.

Following detonation of UXO soil samples will be collected as a screening tool to identify the potential presence of ordnance-related contaminants. However, the sample effort will not be of the magnitude to allow for delineation of any contamination, if identified. This effort will be included in a follow-up investigation to the EE/CA effort, if warranted.

Ordnance scrap and recovered metal debris may be temporarily stored on site at a location approved by ACOE. Dedicated, lockable storage containers will be used to store items certified as non-hazardous and UXO items (non-UXO) awaiting further inspection or venting. Post intrusive investigation scrap metal and certified-inert UXO scrap will be removed from the site at the completion of the field portion of the project. The debris will be transported to the appropriate military agency or other ACOE-approved entity, to be determined after field mobilization. The UXO scraps will be certified non-hazardous prior to transportation and disposal at a recycling facility, certified to receive and recycle UXO scraps.

Biological Impact Control:

Based on a search of the Rarefind Natural Diversity Database, provided by the California Department of Fish and Game (CDFG), the Howe's Hedgehog Cactus has been identified within the Camp boundaries, but is unlikely to be impacted due to vegetation avoidance planned for the project. The Desert Tortoise, a known endangered animal species, has also been identified in the project area. Intrusive aspects of the EE/CA investigation could potentially diminish the ecological quality of desert habitat, which the tortoise depends upon, and which has been designated as "critical habitat" under other provisions of the Endangered Species Act. Other protected wildlife species at the Camp include the Pallid Bat, California Leaf-nosed Bat, Occult Little Brown Bat, Southwestern Cave Myotis, Spotted Bat, Pacific Western Big-eared Bat, and Greater Western Mastiff Bat.

A dedicated biologist approved by the Corps of Engineers, Los Angeles District (CESPL) will accompany each of the geophysical field teams during the survey effort to ensure that sensitive areas are avoided by indicating to the geophysical teams when to modify the transect path or grid location. A biologist will inspect the area surrounding anomalies selected for intrusive investigation to ensure the absence of the Desert Tortoise. As approved by the Fish and Wildlife Service through the issuance of a Biological Opinion, a buffer zone (minimum 40 feet) around the desert tortoise burrows will be maintained. The field teams will be provided with awareness training prior to mobilization to ensure their familiarity with protected plant species and Desert Tortoise habitats.

The mammals identified as present at the project site would likely only fly over the worksite near dusk and after dark, times when all UXO activities would have ceased for the day. No evidence of roost sites commonly used by any of the bat species has come to light within the project area.

Cultural Resources Impact Control:

Archaeologists accompanying the geophysical teams will note cultural materials more than 50 years old, record the location with a global positioning system (GPS) equipment, and then decide whether the materials represent isolated artifacts or a cultural site. During the evaluation of geophysical data, the determination of cultural sites may prevent investigation of anomalies that are coincident with the location.

Erosion and Dust Control:

All soil removal will be placed in the vicinity of the excavation and once actions are complete, the soil will be returned to the area from which it came. No excavation will be started which cannot foreseeably be refilled that very day; however, some holes may be left temporarily open at the request of the Corps of Engineers, Los Angeles District (CESPL) archaeologist. In such instances, tarpaulins will be placed on open excavations to prevent erosion.

During ordnance removal activities, soil may be displaced by intrusive excavation of small areas (typically, 2-foot by 2-foot or less). All excavations will be restored by backfilling with the displaced soil. Each site will be regraded to its former conditions so that local drainage is not modified. Backfilling and regrading will be accomplished manually with shovels and rakes.

Traffic Control:

The Camp is traversed by several active roads and rail lines that may fall within the MSD required for public safety. For roadways and rail lines intersecting the MSD, dedicated guards with radios will be placed at a location sufficiently outside the MSD to alert the UXO team of vehicular and rail traffic entry into the MSD. All intrusive activities will stop until the MSD is free of vehicles. In addition, the intrusive activities will be focused to the off-peak traffic times to maximize production. The traffic plan is incorporated by reference.

Traffic control measures will be taken to ensure proper traffic flow into and out of the removal area and will include, but not be limited to, the identification of routes by flagging, barricades, traffic delineators, or cones. The primary points of access to Camp Ibis are United States Highway 95 and the historical monument main ingress. The main vehicular traffic arterial and connector road leading to the project area is Highway 95. Vehicular access to the project will be kept to a minimum. All proposed routes of travel and parking areas will be designated and cleared (authorized) by the CESPL and the Bureau of Land Management (BLM) archaeologist prior to commencement of the geophysical and soil sample study. Roads designated by the BLM as inactive are closed for vehicular access.

Approximately 8 to 16 daily workers' round-trip commutes will be required over the 13 weeks nominal project duration. Vehicles will be parked solely within the site area. Transportation

related to the project will take place at off-peak traffic hours between 9:00 a.m. to 4:00 p.m. Camp Ibis is remotely located in the undeveloped sections of the City of Needles, and no significant traffic impact into and out of the project site is expected.

Transportation of safe to move UXO items (non-UXO) within the site boundary will comply with all federal, state, and local regulations. It is not anticipated that any UXO will need to be transported off-site. If site conditions change, an addendum to the work plan will be prepared and submitted to ACOE, BLM, and DTSC for review prior to modification of the current work plan procedures. A qualified UXO representative will escort all movement of safe to move UXO items on-site. When transporting UXO within the site for consolidation purposes, vehicles will not exceed 25 mph on designated routes. At Camp Ibis, a prudent speed will likely be significantly less than 25 mph and will occur only on the few roads for which BLM has granted vehicular-traffic approval. All movement of UXO and demolition explosives on-site outside the approved driving areas will be via pedestrian means. UXO will not be transported in conjunction with demolition materials.

Schedule:

The duration of removal activities at the Camp site is 13 weeks but the overall project, from mobilization to demobilization, will take about four months. The estimated duration for the geophysical effort is 10 weeks but is dependent on the number of field teams utilized and actual production realized. Field activities are scheduled to begin in early-September and end in December 2002. However, the schedule depends upon the timely completion of a public comment period and response(s) to public comments.

Agencies Having Jurisdiction Over the project/ Types of Permits Required: California Environmental Protection Agency, Department of Toxic Substances Control will be overseeing the project with Lead Agency responsibilities. The Bureau of Land Management will provide permits for road usage.

II. DISCRETIONARY APPROVAL ACTION BEING CONSIDERED BY DTSC

	Initial Permit Issuance		Removal Action Plan
	Permit Renewal	×	Removal Action Workplan
	Permit Modification		
_	Clasura Dian		Interim Removal
Ц	Closure Plan	×	Other (Specify)
	Regulations	_	Engineering Evaluation /Cost Analysis

Program/ Region Approving Project: Site Mitigation Program

Southern California Branch Office of Military Facilities

Contact Person/ Address/ Phone Number: Mr. Omoruyi Patrick, P.E.

Department of Toxic Substances Control

Southern California Branch Office of Military Facilities 5796 Corporate Avenue Cypress, California 90630

(714) 484-5452

III. ENVIRONMENTAL RESOURCES POTENTIALLY AFFECTED

The boxes checked below identify environmental resources which were found in the following ENVIRONMENTAL SETTING/IMPACT ANALYSIS section to be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact".

	Aesthetics		Hydrology and Water Quality		Public Services
	Agricultural Resources				Recreation
			Land Use and		
	Air Quality		Planning		Transportation and Traffic
	Biological Resources	П	Mineral Resources		
_	ga	_		П	Utilities and Service
	Cultural Resources		Noise	_	Systems
	Geology And Soils		Population and Housing		Cumulative Effects
	Hazards and Hazardous Materials		,		

IV. ENVIRONMENTAL IMPACT ANALYSIS

The following pages provide a brief description of the physical environmental resources that exist within the area affected by the proposed project and an analysis of whether or not those resources will be potentially impacted by the proposed project. Preparation of this section follows guidance provided in DTSC's <u>California Environmental Quality Act Initial Study Workbook</u> [Workbook]. A list of references used to support the following discussion and analysis are contained in Attachment A and are referenced within each section below.

Mitigation measures which are made a part of the project (e.g. permit condition) or which are required under a separate Mitigation Measure Monitoring or Reporting Plan which either avoid or reduce impacts to a level of insignificance are identified in the analysis within each section.

1. Aesthetics

Project activities likely to create an impact.

The UXO investigation/interim removal action will require a small backhoe and vehicles entering the site during the excavation period.

Description of Environmental Setting:

The former Camp's primary usage was a training facility for desert warfare, for military testing of equipment, ammunition, weapon systems, for various armor divisions training and for the Desert Strike Force Team training. Public access to the site will be very limited. Site security will be adjusted for each activity at the site, and personnel checkpoints, barriers, tape, etc will limit access. Generally, it is anticipated that the site team will be the only personnel on the site.

The Camp is located within a large alluvial plain with both east and west areas gradually sloping up to their respective mountain ranges. The region encompassing the site is generally flat with rolling hills on both sides of Piute Wash. Piute Wash runs along the entire eastern side of the Camp. Numerous smaller washes are present, all of which drain into Piute Wash. The surface

soil is characterized as immature sandy soil. The ground is sparsely covered with arid vegetation such as various cacti, creosote, white bursage, and yucca. Trees are few and very widely scattered within the project area.

Analysis of Potential Impacts:

When the Camp was classified inactive in 1964, the ACOE was tasked to mitigate the potential ordnance contamination at the Camp to reduce potential risks and hazard to human health and the environment.

The vehicular access gate is very limited, and a sign is posted stating that the Camp is closed because of the finding of potential ordnance-contaminated soil.

The investigation and removal action will not alter the final appearance of the site. During ordnance removal activities, soil may be displaced by intrusive excavation of small areas (typically, 2-foot by 2-foot or less). All excavations will be restored by backfilling with the displaced soil. Each site will be regraded to its former conditions so that local drainage is not modified. Backfilling and regrading will be accomplished manually with shovels and rakes.

The removal action will not add new light or glare to the site, will not block any views, or obstruct any scenic vista or view open to the public. Therefore, the project will not:

- a. Have a substantial adverse effect on a scenic vista.
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway.
- c. Substantially degrade the existing visual character or quality of the site and its surroundings.
- d. Create a new source of substantial light of glare which would adversely affect day or nighttime views in the area.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

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	Potentially Significant Impact
	Potentially Significant Unless Mitigated
\boxtimes	Less Than Significant Impact
П	No Impact

2. Agricultural Resources

Findings of Significance:

Project activities likely to create an impact.

The project will not have significant agriculture resource impacts because the site is zoned for industrial/commercial use, and there is no agriculture or farming activities at or near the site.

Description of Environmental Setting:

The Camp is located within a large alluvial plain with both east and west areas gradually sloping up to their respective mountain ranges. The region encompassing the site is generally flat with rolling hills on both sides of Piute Wash. Piute Wash runs along the entire eastern side of the Camp. Numerous smaller washes are present, all of which drain into Piute Wash. The surface soil is characterized as immature sandy soil. The ground is sparsely covered with arid vegetation such as various cacti, creosote, white bursage, and yucca. Trees are few and very widely scattered within the project area.

Analysis of Potential Impacts:

Because the site is zoned for industrial/commercial use, and no agriculture or farming activities occur at or near the site, the investigation/removal action at the Camp will not:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- b. Conflict with existing zoning or agriculture use, or Williamson Act contract.
- c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

Findings of Significance:

	Potentially Significant Impact
	Potentially Significant Unless Mitigated
	Less Than Significant Impact
X	No Impact

3. Air Quality

Project activities likely to create an impact:

Investigation/excavation of the ordnance-contaminated soil has the potential to generate very limited air emissions in the form of fugitive dust and vehicle exhaust from construction equipment.

Description of Environmental Setting:

The prevailing wind direction is a northwesterly sea breeze from sea to land. The wind speeds in the region are typically light to heavy. Occasionally, gusty winds from the northeast, known

locally as Santa Ana winds, bring warm, dry air to the region. The Santa Ana winds usually occur during the summer or fall. The Camp is within the San Bernardino Air Pollution Control District (SBAPCD) jurisdiction. The project area is classified as a non-attainment area.

Analysis of Potential Impacts:

The purpose of this project is to perform a geophysical survey of the area, however there is a possibility that some excavation and the demolition of UXO may occur. Excavations in the intrusive phase will typically be less than 2-feet by 2-feet areas. If any excavations occur, the soil will be replaced either the same day as the excavation or the site will be tarped so that the archaeologist may investigate the site. Therefore, dust control will not be required for this project.

Under CERCLA action, permits are not required as long as they meet the Removal Action Plan/Removal Action Workplan, CEQA, and Public Meeting/Notice requirements.

Therefore, the project will <u>not</u>:

- a. Conflict with or obstruct implementation of the applicable air quality plan.
- b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
- c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
- d. Expose sensitive receptors to substantial pollutant concentrations.
- e. Create objectionable odors affecting a substantial number of people.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

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	Potentially Significant Impact
	Potentially Significant Unless Mitigated
\boxtimes	Less Than Significant Impact
	No Impact

4. Biological Resources

Findings of Significance:

Project activities likely to create an impact:

Investigation and removal activities of UXO -contaminated soil have the potential to adversely affect on wildlife habitats.

Description of Environmental Setting:

Camp Ibis project area is sparsely covered with arid vegetation such as various cacti, creosote, white bursage, and yucca. Trees are few and very widely scattered within the project area, primarily blue paloverde (Cercidium floridum) and iron wood (Olneya tesota).

The area surrounding the Camp is dominated by annual grassland scrub habitat. The low stature of annual grassland plants provides little cover and few nesting sites for wildlife. No wetlands, streams, ponds, or any aquatic habitats are present at the site.

Based on a search of the Rarefind Natural Diversity Database, provided by CDFG, the Howe's Hedgehog Cactus grows within the Camp. The Desert Tortoise is a known threatened animal species listed by the Fish and Wildlife Service that has been identified in the project area. The project area is also federally designated critical habitat for the tortoise. Other protected wildlife species at the Camp include the Pallid Bat, California Leaf-nosed Bat, Occult Little Brown Bat, Southwestern Cave Myotis, Spotted Bat, Pacific Western Big-eared Bat, and Greater Western Mastiff Bat. A burrowing owl sighting occurred near the town of Needles but biologists have not sighted owls on the project site. The Camp is probably not suitable habitat for the burrowing owl due to the lack of water.

The project site has special designation as a California Desert Conservation Area, which mandates a high degree of protection and highly restricts access and use, and lies within the Dead Mountains Wilderness Area. The eastern half of Camp Ibis is restricted against entry by motor vehicles, creation of any form of road or trail, and construction of any dwelling. Public use by walking through the designated Wilderness Area is allowed.

Analysis of Potential Impacts:

A review of the Rarefind Natural Diversity Database provided by CDFG has revealed that the primary species of concern is the federally listed Desert Tortoise. Intrusive aspects of the EE/CA investigation could potentially diminish the ecological quality of desert habitat, which the tortoise depends upon and, which has been designated as "critical habitat" under other provisions of the Endangered Species Act. The ACOE has entered into Section 7 Consultation with the US Fish and Wildlife Service to evaluate the biological assessment report submitted by the ACOE. A copy of the Biological Assessment is incorporated by reference.

The US Fish and Wildlife Service will issue a Biological Opinion that authorizes the incidental take of desert tortoise in accordance with the Endangered Species Act prior to the initiation of the project. The Biological Opinion will ensure that the taking must not be likely to jeopardize the continued existence of listed species or destroy or adversely modify designated critical habitat, result from an otherwise lawful activity, and be incidental to the purpose of the action.

Every effort will be made to avoid protected species during the geophysical survey along the transects and within grids. The UXO teams will receive awareness training prior to mobilization to familiarize them with the protected plant species and the desert tortoise. A biologist will accompany each team during the geophysical survey of the transects and assist the UXO team in plotting out a course that avoids protected species and environmentally sensitive areas. Vehicles will only travel on existing dirt roads and at low speeds. The UXO team will be instructed to avoid cutting or clearing of any desert vegetation. If absolutely unavoidable, such actions will be coordinated with the biologist. A minimum 40-foot buffer or as required by the Fish and Wildlife Service will be provided to Desert Tortoise burrows identified by the biologist.

If UXO technicians begin to excavate an anomaly and break through an unseen Desert Tortoise burrow, investigation at that specific location will be abandoned entirely unless immediate evidence of an UXO item becomes apparent. Breaches of the burrows will be repaired. If intrusive investigation proceeds and the presence of UXO is confirmed, on-site demolition may be required for safety reasons. During this demolition phase, reasonable efforts to minimize impacts on known protected species will be implemented, but at no time will a confirmed UXO item be left on-site. The biologist will scan for burrows in the vicinity of the detonation and attempt to retrieve any individuals from the burrows and relocate them. If a Desert Tortoise requires temporary relocation from the immediate area of a demolition, a person authorized by the U.S. Fish and Wildlife Service, under the conditions of the Biological Opinion, will carry the animal a safe distance. Areas that have been impacted by the project will be restored, to the greatest extent practicable, to the previously existing condition at the completion of the project. If a desert tortoise is found to be harmed or destroyed by the project, the project will be halted and the controls protecting the desert tortoise will be reevaluated by the Fish and Wildlife Service and by the ACOE.

It is not anticipated that any individuals will be harmed because the ACOE has taken many precautions to protect the Desert Tortoise and its burrows such as awareness training for staff, providing an onsite biologist, and designing the project to avoid the tortoise and its habitat. Also, expert judgement by UXO specialists indicates that the possibility of having to perform UXO detonations is low, zero to four detonations. A worst case scenario would be up to 50 UXO detonations over the project site or 1 detonation per 2 acres. Impacts to the desert tortoise will not be ongoing because the project is scheduled for only 10 weeks.

The mammals identified as present at the project site would likely only fly over the worksite near dusk and after dark, times when all UXO activities would have ceased for the day. No evidence of roost sites commonly used by any of the bat species has come to light within the project area. In consequence, there is negligible potential adverse effect to any of these mammals from this EE/CA study.

The Howe's Hedgehog Cactus is unlikely to be impacted due to vegetation avoidance planned for the project.

With the above protective measures, the project will not:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

e. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

January 2002, Natural Diversity Data Base, Natural Heritage Division, California Department of Fish and Game. Review of Needles SW, Needles NW, Bannock, and Flattop Mountain quadrangle.

Findings (of Si	anific	cance:
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	Potentially Significant Impact
	Potentially Significant Unless Mitigated
\times	Less Than Significant Impact
	No Impact

5. Cultural Resources

Project activities likely to create an impact.

Detonation and removal activities have the potential to adversely affect cultural resources present.

Description of Environmental Setting:

Camp Ibis is eligible for listing in the National Register of Historic Places, and is therefore afforded protection under the National Historic Preservation Act. Camp Ibis is also a registered landmark in the State of California. In addition to historic sites, prehistoric sites may be present.

Analysis of Potential Impacts:

A dedicated archeologist, approved by CESPL, will be assigned to each geophysical team in order to record cultural resources. The archeologist will ensure that sensitive areas are avoided by indicating to the geophysical teams when to modify the transect path or grid location.

If potential cultural artifacts are encountered during intrusive investigation, excavation will cease (assuming UXO has not been confirmed) and United States Army Corps of Engineers, Engineering and support Center, Huntsville (USAESCH) and the BLM and CESPL archeologists will be notified immediately. Otherwise, the goal is to avoid all cultural resources during the geophysical survey and intrusive sample phases. As described above, dedicated archeologists accompanying the geophysical teams will take appropriate measures to minimize the chance of encountering sensitive conditions during the intrusive phase of the project.

Archaeological site locations are confidential; however, Project and Contract personnel are allowed access to the locational data for planning purposes. Means of avoiding these resources once information is received will include (1) literature review/GIS mapping of sensitive resources;

(2) establishment of transects/grids to avoid sensitive resources; and (3) intrusive-phase assessments. If unanticipated cultural resources are encountered during intrusive investigations, work will halt and the CESPL-approved archaeologist will be notified immediately.

Neither historic nor prehistoric artifacts (not including UXO-related artifacts) will be picked and/or collected by the Contractor under penalty of law (felony). A CESPL archeologist will provide a cultural resource briefing prior to the implementation of the program.

The Archives Search Report (ASR) identified the Dead Mountains Wilderness Area that covers the eastern half of the Camp, as an area protected by the Department of Interior. Piute Wash marks the western boundary of this Wilderness Area. This area is restricted against entry by motor vehicles, creation of any form of road or trail, and construction of any dwelling. Public use by walking through the Wilderness Area is allowed. Additionally, the ASR provided a list of known natural and cultural resources.

The National Historic Preservation Act requires the identification of all cultural resources greater than 50 years in age in the project's area of potential effects. Unless any resources present can be avoided by the project, they will have to be evaluated for eligibility for listing in the National Register of Historic places. If the resources are determined eligible, all work in the area will be stopped. Furthermore, procedures will be determined in consultation with BLM (landowner), a California State Historic Preservation Officer, the Advisory Council on Historic Preservation, interested Indian Tribes, and other interested parties. CESPL and BLM will coordinate these activities. Historic features were identified on Camp Ibis.

Every effort will be made to avoid archeological resources during the geophysical survey along the transects and within grids. In part, this may be accomplished by strict adherence to vehicular travel only on existing dirt roads. Historic rock alignments associated with Camp Ibis will be left undisturbed.

Subsurface archaeological investigations of anomalies identified for intrusive investigation will not be conducted for the intrusive phase of the investigations for purposes of safety. Archaeological investigations during this phase would require excavation of materials and disturbance of soils, which cannot be conducted within areas where suspect UXO exists for purposes other than removal and disposal of these materials. In order to avoid all cultural resources, any and all anomalies identified by the geophysical study that exhibit cultural resources on the surface will be eliminated from the intrusive investigation. If unanticipated cultural resources are discovered during the intrusive investigation, work will halt and an archaeological investigation may be necessary.

With the implementation of the above measures, the removal action at the Camp will not:

- Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.
- b. Cause a substantial adverse change in the significance of an archeological resource pursuant to 15064.5.
- c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- d. Disturb any human remains, including those interred outside of formal cemeteries.

References:

California Department of Parks and Recreation, 2002. Office of Historic Preservation. www.ohp.parks.ca.gov.

National Park Service, 2002. National Register of Historic Places. www.cr.rps.gov.

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

Findings of Significance	Findinas	of Si	ianificai	псе.
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	Potentially Significant Impact
	Potentially Significant Unless Mitigated
\boxtimes	Less Than Significant Impact
	No Impact

6. Geology and Soils

Project activities likely to create an impact.

The proposed investigation/removal actions will not adversely effect site geology or soils.

Description of Environmental Setting:

The Camp is located within the Great Basin and sits in the Piute Valley between the Homer Mountains (west side) and the Dead Mountains (east side). The Camp is located within a large alluvial plain with both east and west areas gradually sloping up to their respective mountain ranges. The region encompassing the site is generally flat with rolling hills on both sides of Piute Wash. Piute Wash runs along the entire eastern side of the Camp while U.S. Highway 95 crosses through the flatter western half (Figure 2.2). Numerous smaller washes are present, all of which drain into Piute Wash.

The soils at the Camp are of a dissected Piedmont alluvial plain. The shifting of tectonic plates and the volcanic action that formed various mountain chains made these alluvial plains (valleys). The rocky surface layers are comprised primarily of basalt. Basalt is a porous rock formed from volcanic activities. The subsurface layer is made up of granite. Wind and water erosion fragmented the volcanic formations creating immature sandy soil. The camp terrain is covered by this immature sandy soil that is characterized by a high rate of hydraulic conductivity. However, due to limited rainfall, the water table is well below the ground surface.

Analysis of Potential Impacts:

All soil removal will be placed in the vicinity of the excavation and once actions are complete, the soil will be returned to the area from which it came. No excavation will be started which cannot foreseeably be refilled that very day; however, some holes may be left temporarily open at the request of the CESPL archaeologist. In such instances, tarpaulins will be placed on open excavations to prevent erosion.

During ordnance removal activities, soil may be displaced by intrusive excavation of small areas (typically, 2-foot by 2-foot or less). All excavations will be restored by backfilling with the displaced soil. Each site will be regraded to its former conditions so that local drainage is not modified. Backfilling and regrading will be accomplished manually with shovels and rakes.

Because this site is not crossed by any known active or potentially active faults and all soil removed will be replaced, the project at Camp Ibis will not:

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42)
 - Strong seismic ground shaking
 - Seismic-related ground failure, including liquefaction
 - Landslides
- b. Result in substantial soil erosion or the loss of topsoil.
- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.
- e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of water.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

Findings of Significance:

	Potentially Significant Impact
	Potentially Significant Unless Mitigated
X	Less Than Significant Impact
	No Impact

7. Hazards and Hazardous Materials

Project activities likely to create an impact:

Potential risks associated with the project include accidents and injuries to project workers and spills of hazardous materials during the project activities.

Description of Environmental Setting:

The Camp is located in a remote location outside Needles. Site access control will be implemented by the Senior UXO Supervisor (SUXOS), and will be accomplished through a program that limits movement and activities of people and equipment at the project site. Site control requires the establishment of work zones, a communications network, an evacuation protocol, and site security. Site access control will include the following: (1) worker/visitor registration, (2) escort of visitors, (3) Personnel Protective Equipment requirements, and (4) posting of site/work area boundaries. Site security will be adjusted for each activity at the site, and personnel checkpoints, barriers, tape, etc will limit access. Generally, it is anticipated that the site team will be the only personnel on the site.

Analysis of Potential Impacts:

A low probability of encountering UXO is anticipated at the Project Site. While an accidental detonation of UXO during project-related activities has the potential to create a significant hazard to the public or the environment, control measures will effectively eliminate the potential for significant hazards from an accidental detonation. Implementation and enforcement of the following control measures will effectively eliminate potentially significant hazards from an accidental detonation.

A short tailgate safety meeting will be held each morning. Topics will include a review of safety procedures for that day's activities, which may include changes in site conditions, topics covered in the initial health and safety meeting as they apply to daily activities, medical surveillance program, personal protective equipment, potential chemical and physical hazards, etc. Certificates and records of on-site training will be maintained by the UXO Safety Officer.

The SUXOS is American Technology, Incorporated's (ATI) most senior UXO -qualified on-site representative. The SUXOS will monitor all aspects of the filed project, including subcontractor site activities, to ensure efficient performance of the approved workplan. In all areas suspected of having possible UXO contamination, the UXO-qualified person will inspect the areas where personnel may transit. A magnetometer check of all points where location stakes or posts are to be driven into the soil, or where control points are to be established, will be accomplished prior to placement of stakes. If the magnetometer indicates a positive reading (via audio/visual signal), no monuments, stakes, or posts will be driven into the ground at that specific location.

An exclusion zone will be established to protect the non-essential project personnel and the public from intentional detonation and unintentional detonations. The Minimum Separation Distance (MSD) of 2577 feet is based on the most probable munition (a 155 mm projectile) for Areas A, B, and C. If sampling conditions or site data warrant the ACOE, Engineering and Support Center, Huntsville may reduce the approved MSD to a distance based on one hazardous fragment per 600 square feet (447 feet). A reduction of the MSD to 220 feet may also be requested for implementation of engineering controls. Because a MSD and site security will be maintained, impacts of a less than significant impact to the general public from an accidental detonation is expected.

In the event that a live UXO item is discovered, the following procedures will be followed. UXO encountered during project activities will be visually inspected in place (in the position found) to determine whether or not it is safe to move. The inspection will be directed by the SUXOS, in conjunction with the Site Safety Officer. The determination that the item is UXO or UXO scrap is based on the experience, training, and knowledge that is required by federal agencies for the positions these personnel hold.

If the item is determined to be UXO versus inert UXO scrap, a determination will be made as to whether the item is safe to move. If the item is not safe to move, the SUXOS will halt all fieldwork and require all nonessential personnel to move outside of the MSD. If the item is safe to move, it will be properly stored in the consolidation area for later disposal that day. These procedures will be followed to ensure the risk of an accidental detonation is minimized.

In the event of an accidental detonation, the ACOE will perform a thorough investigation of the incident. Any new procedures identified as a result of the investigation will be implemented during the remainder of the project.

Implementation of the proposed project will not impair any local emergency response plans or emergency evacuation plans. The local officials will be notified of the commencement of the treatment of any ordnance found. The Sheriff's Department and the County Fire Department have adequate staff and knowledge of the site to respond appropriately to such an incident.

A public outreach effort will inform the public of the start of treatment activities, the progress, and the appropriate ACOE and DTSC staff to contact for information or complaints regarding the investigation or any detonation activity. This will avoid excessive use of the City's emergency response capability and 911 reporting system for non-emergency public concerns.

If an accidental detonation were to occur, the detonation would not be large enough to cause any type of unstable earth conditions or result in any type of geologic hazard off the property. Therefore, there would be no significant risk of geologic upset resulting from an accidental detonation of UXO.

Ordnance scrap and recovered metal debris may be temporarily stored on site at a location approved by ACOE. Dedicated, lockable storage containers will be used to store items certified as non-hazardous and UXO items (non-UXO) waiting further inspection or venting. The transportation of material into and out of the site will take approximately 4 weeks each and estimated about 2 to 4 trucks a day. Post intrusive investigation scrap metal and certified-inert UXO scrap will be removed from the site at the completion of the field portion of the project. The debris will be transported to the appropriate military agency or other ACOE-approved entity to be determined after field mobilization.

Traffic control measures will be taken to ensure proper traffic flow into and out of the removal area and will include, but not limited to the identification of routes by flagging, barricades, traffic delineators, or cones. All persons transporting hazardous materials will possess the necessary United States Department of Transportation training per Code of Federal Regulations, title 49. All vehicles used will be insured for accidental liability. All loads will be securely fastened and covered at all times. In the event of a hazardous material release, transportation truck drivers are trained to isolate the area of a spill and call proper authorities. California Highway Patrol (CHP) works as the chief responder to hazardous material releases on state highways. CHP can respond accordingly to a material spill based on information provided by the driver, waste manifest forms, and/or truck placards.

With the exception of small quantities of gasoline, no hazardous fluids will be used onsite. For spill control and prevention, any container of gasoline temporarily stored on the site will be placed in a dedicated plastic tub before and after use. The smallest container necessary to store sufficient gasoline for one day's operation will be used.

The site is not included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5.

The removal action at the Camp will not:

- a. Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.
- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.
- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to public or the environment.
- e. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

Findinas of	Significance:
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	Potentially Significant Impact
	Potentially Significant Unless Mitigated
X	Less Than Significant Impact
1	No Impact

8. Hydrology and Water Quality

Project activities likely to create an impact:

Surface water runoff may be a transport mechanism for UXO contamination migration.

Description of Environmental Setting:

Surface Water Hydrology- The Camp is located in the Mojave Valley in the Needles Hydrologic subunit of the Needles Hydrologic Unit. The soil is characterized by a high rate of hydraulic conductivity, but due to limited rainfall the water table is significantly below the ground surface. Similarly, no surface water or wetland conditions are present within the site. The surface water hydrology at the Camp is characterized primarily by high-gradient overland flow and by unlined surface water ditches. The Camp has no perennial surface water. Surface water from storms rapidly infiltrates site soils. During rain events, the small washes in the eastern portion of the Camp combine into Piute Wash. The raging water travels at high speeds and causes tremendous erosion.

Groundwater Hydro-geology - The Camp is located within the Great Basin and sits in the Piute Valley between the Homer Mountains (west side) and the Dead Mountains (east side). The Camp is located within a large alluvial plain with both east and west areas gradually sloping up to their respective mountain ranges. The region encompassing the site is generally flat with rolling hills on both sides of Piute Wash. Piute Wash runs along the entire eastern side of the Camp while U.S. Highway 95 crosses through the flatter western half (Figure 2.2). Numerous smaller washes are present, all of which drain into Piute Wash. The surface soil is characterized as immature sandy soil. The surrounding land is currently vacant for miles. The alluvial deposits in

the area consist of sands and clays. The hydro-geology at the Camp appears complex due to the Basaltic Granite Formation consisting of a porous rock formed from volcanic activities.

Analysis of Potential Impacts:

The bedrock underlying the Camp is made up of granite. The Basaltic Granite Formation consists of porous rock formed from volcanic activities. Numerous smaller washes are present, all of which drain into Piute Wash. The surface soil is characterized as immature sandy soil. The surrounding land is currently vacant for miles.

No surface waters (other than small, intermittent puddles) and no freshwater aquatic/emergent vegetation has been observed in this area during site investigations.

Because the water table is considerably below the surface, the project will not:

- a. Violate any water quality standards or waste discharge requirements.
- b Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficient in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).
- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site.
- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.
- e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.
- f. Otherwise substantially degrade water quality.
- g. Place within a 100-flood hazard area structures which would impede or redirect flood flows.
- h. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.
- I Inundation by sieche, tsunami or mudflow.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

Findings of Significance:

	Potentially Significant Impact
	Potentially Significant Unless Mitigated
	Less Than Significant Impact
X	No Impact

9. Land Use and Planning

Project activities likely to create an impact.

Since UXO-contaminated soil could remain beneath the surface at some unidentified areas, a deed restriction will be placed on the site.

Description of Environmental Setting:

The area is zoned for industrial/commercial use and no occupied buildings are present within several miles of the property. A bordering population center is Needles, 20 miles from the Camp. Current stakeholders of the Camp include:

- Department of the Interior, Bureau of Land Management
- Southern Pacific Properties, Incorporated
- SFP Minerals Corporation
- Burlington Northern & Santa Fe Railroad
- California, Arizona & Santa Fe Railroad
- City of Needles
- Cadiz Land Company, Inc.
- Santa Fe Pacific Gold
- State of California

Analysis of Potential Impacts:

The 13,398 acres that include the Camp and several adjacent firing ranges are completely undeveloped, aside from U.S. Highway 95 that crosses the western edge. The desert vegetation is sparse in the sandy soil and few trees are present. No occupied buildings are present within at least several miles of the property. Within the project area, all land to the east of and including Piute Wash is designated as the Dead Mountains Wilderness Area (Figure 2.2). As such, public land use is limited under the BLM and the California Desert Protection Act of 1994. A concrete monument with brass plaque is the only identifier of the Camp along U.S. Highway 95. East of the monument the remains of detailed rock alignments are present that outline insignias, some plants, former roads, and pathways that made up the cantonment area. The Camp is not fenced and unauthorized public use of the area for camping and off-road driving is evident. The area is used for upland game hunting with hunters traversing the area from within Piute Wash. The ASR documented that Santa Fe Pacific Properties is evaluating the feasibility of agricultural development of their parcels. To date, no evidence of development is present.

Land Use Restrictions and Regulatory Controls provide the primary institutional control that can be exercised over areas where ordnance is present. Through these controls, local government can dictate the type of development that will occur within an AOI, and the methods in which that development occurs. Because the Camp is located entirely within San Bernardino County, the county Comprehensive Plan defines the kinds of uses that may occur on the Camp property currently and in the foreseeable future. Since much of the Camp falls within the Dead Mountains Wilderness Area, and is controlled by BLM, neither residential nor commercial development is a concern. The primary intent would be to disclose to visitors to the area and the public at large that UXO may be present within certain areas and an increased level of awareness and caution should be taken in the use of the land.

Although a deed restriction will be placed on the Camp following all investigation/removal activities, the area will remain zoned for industrial/commercial use. The deed restriction placed on the Camp will not affect future use for industrial/commercial activities.

Signs can be posted along the perimeter of specific areas to warn the public about the risk of exposure to ordnance items. Signage can also include information regarding site access restrictions, how to respond to discoveries of ordnance items, telephone numbers and addresses to contact with questions or concerns, and any other applicable site-specific information.

The removal action at the Camp will <u>not</u>:

- a. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

Findings of Significance:

	Potentially Significant Impact
	Potentially Significant Unless Mitigated
X	Less Than Significant Impact
	No Impact

10. Mineral Resources

Project activities likely to create an impact:

The UXO investigation and removal action will not have significant impacts on mineral resources because there will be no below ground excavation that would disrupt mineral resources.

Description of Environmental Setting:

No effects on natural resources are anticipated during the investigation/removal actions at the Camp. The proposed investigation/removal actions would not result in an increased rate of use of natural resources, nor would it result in any substantial depletion of nonrenewable resources

Analysis of Potential Impacts:

No effects on natural resources are anticipated during the investigation/removal actions at the Camp. The project will only involve small, earth moving vehicles and equipment; therefor, the

proposed investigation and removal action will not result in an increased rate of use of natural resources, nor will it result in any substantial depletion of nonrenewable resources.

The area is not in a mineral resource area, therefore, it will not:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

January 2000, Natural Diversity Data Base, Natural Heritage Division, California Department of Fish and Game.

Findings of Significance:

	Potentially Significant Impact
	Potentially Significant Unless Mitigated
	Less Than Significant Impact
X	No Impact

11. Noise

Project activities likely to create an impact:

Heavy equipment and trucks will generate noise during on-site project activities.

Description of Environmental Setting:

The Camp is located approximately 20 miles from the nearest residential area. Personnel working on the project will be exposed to short-term noise due to machinery and trucks. Project implementation will adhere to procedures outlined in the Site Health and Safety Plan to maintain workers exposure within acceptable noise levels.

Analysis of Potential Impacts:

Personnel working on the project will be exposed to short-term noise due to machinery and trucks. This hazard must be evaluated and provisions made to provide site personnel with hearing protection devices if 8-hour average noise levels may exceed 85 decibels (dBA), or peak impact noise levels may exceed 140 dBA. Workers on the project will use personal protective equipment, such as earplugs or other hearing protection. Project implementation will adhere to procedures outlined in the DTSC approved Site Health and Safety Plan prepared pursuant to the Code of Federal Regulations, title 29, section 1910.120 and California Code of Regulations, title 8, section 5192, to maintain workers exposure within acceptable noise levels.

Project activities will not be conducted between sunset and sunrise. Additionally, since the Camp is remotely located approximately 20 miles from the nearest residential receptors, it will not have an impact on those receptors.

Therefor, the project will <u>not</u>:

- a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- b. Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels.
- c. A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.
- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

SAIC, 2002. Draft Remedial Action Plan, Point Vicente Interpretive Center, January 8, 2002.

Findings of Significance:

	Potentially Significant Impact
	Potentially Significant Unless Mitigated
X	Less Than Significant Impact
	No Impact

12. Population and Housing

Project activities likely to create an impact.

The UXO investigation and removal actions will not have a significant impact on population or housing because the project does not involve the creation or destruction of housing.

Description of Environmental Setting:

The area is zoned for industrial/commercial use and no occupied buildings are present within at least several miles of the property. A bordering population center is Needles, 20 miles from the Camp.

Analysis of Potential Impacts:

The project does not involve the creation or destruction of housing. Additionally, the project will not require the displacement of any substantial numbers of existing housing or people. No occupied buildings are present within at least several miles of the property. A bordering population center is Needles, 20 miles from the Camp.

Therefore, the removal action at the Camp will not:

- Induce substantial population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

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	Potentially Significant Impact
	Potentially Significant Unless Mitigated
	Less Than Significant Impact
X	No Impact

13. Public Services

Project activities likely to create an impact.

The UXO investigation and removal actions will not have significant impacts on public services, because no additional public services are required.

Description of Environmental Setting:

The entire Camp is under BLM control, which provides its own public safety services.

Analysis of Potential Impacts:

Agencies that may provide emergency response, such as the Needle's city fire and police departments, will be notified in advance of the project activities and the associated hazards. The agencies will acknowledge in writing that they have been briefed; a copy of the acknowledgement will be retained on-site. In the event of an onsite fire or medical emergency, fire suppression and ambulance transfer to local hospital will be available. Existing service levels would not be substantially impacted.

Efforts will be made to prevent the creation of excessive information demands on local emergency service agencies. Every effort will be made to inform the public the start of the project, its progress and the appropriate DTSC staff to contact for information or complaints regarding the excavation or any transportation activity. This will avoid excessive use of the City's emergency response capability and 911 reporting system for non-emergency public concerns.

The removal action at the Camp will not:

- a Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:
 - Fire protection
 - Police protection
 - Schools
 - Parks
 - Other public facilities

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

Findings of Significance:

	Potentially Significant Impact
	Potentially Significant Unless Mitigated
	Less Than Significant Impact
\boxtimes	No Impact

14. Recreation

Project activities likely to create an impact:

The site will remain closed to the public during the remediation activities.

Description of Environmental Setting:

The area is zoned for industrial/commercial use and no occupied buildings are present within at least several miles of the property. A bordering population center is Needles, 20 miles from the Camp.

Analysis of Potential Impacts:

When the Camp was classified inactive in 1964, the ACOE was tasked to mitigate the potential ordnance contamination at the Camp to reduce potential risks and hazard to human health and the environment.

The vehicular access gate is very limited, and a sign is posted stating that the Camp is closed because of the finding of potential ordnance-contaminated soil.

Completion of this project will not result in increased use of the Camp. Use of the Camp will not be similar to use before removal activities.

Therefore, this project will not:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- b. Include recreational facilities or require construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

Findings of Significance:

	Potentially Significant Impact
	Potentially Significant Unless Mitigated
\boxtimes	Less Than Significant Impact
	No Impact

15. Transportation and Traffic

Project activities likely to create an impact:

Construction vehicles entering the site will have temporary effects on Highway 95 traffic within the vicinity of the Camp.

Description of Environmental Setting:

The primary point of access to the Camp is expected to be the Highway 95. The main vehicular traffic arterial and connector road leading to the project area is Highway 95 (Figure 1-1). This road is not directly connected to a freeway.

Analysis of Potential Impacts:

Traffic control measures will be taken to ensure proper traffic flow into and out of the removal area and will include, but not be limited to the identification of routes by flagging, barricades, traffic delineators, or cones. The primary point of access to Camp Ibis is expected to be United States Highway 95 and the historical monument main ingress. The main vehicular traffic arterial and connector road leading to the project area is Highway 95. However, the Camp is traversed by several active roads and rail lines that may fall within the MSD required for public safety. For roadways intersecting the MSD, dedicated road guards with radios will be placed at a location sufficiently outside the MSD to alert the UXO team of vehicular traffic entry into the MSD.

Intrusion into the MSD will result in the UXO team ceasing all intrusive activities. In addition, the intrusive activities will be focused to the off-peak traffic and rail times to maximize production.

Vehicular access to the project will be kept to a minimum. All proposed routes of travel and parking areas will be designated and cleared (authorized) by the ACOE and BLM archaeologist prior to commencement of the geophysical and soil sample study. Roads designated by the BLM as inactive are closed for vehicular access.

Approximately 8 to 16 daily workers' round-trip commutes will be required over the 13 weeks nominal project duration. Vehicles will be parked solely within the site area. Transportation related to the removal action will take place at off-peak traffic hours between 9:00 a.m. to 4:00 p.m. Camp lbis is remotely located in the undeveloped sections of the City of Needles and no significant traffic impact into and out of the project site are expected.

Transportation of safe to move UXO items (non-UXO) within the site boundary will comply with all federal, state, and local regulations. It is not anticipated that any UXO will need to be transported off-site. If site conditions change, an addendum to the work plan will be prepared and submitted to ACOE, BLM, and DTSC for review prior to modification of the current work plan procedures. A qualified UXO representative will escort all movement of safe to move UXO items onsite. When transporting UXO within the site for consolidation purposes, vehicles will not exceed 25 mph on designated routes. At Camp Ibis, a prudent speed will likely be significantly less than 25 mph and will only occur on the few roads for which BLM has granted vehicular-traffic approval. All movement of UXO and demolition explosives onsite outside the approved driving areas will be via pedestrian means. UXO will not be transported in conjunction with demolition materials.

Therefore, this project will not:

- a. Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).
- b. Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway.
- c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- d. Result in inadequate emergency access.
- e. Result in inadequate parking capacity.
- f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

Findings of Significance:

	Potentially Significant Impact
	,' _,'
	Less Than Significant Impact
\boxtimes	No Impact

16. Utilities and Service Systems

Project activities likely to create an impact:

There are no electrical and gas lines in or near the Camp location. The removal action does not involve, address, nor result in the need for substantial amounts of energy as the project will only involve approximately 2-1/2 months of activities. A temporary trailer will be delivered to the Camp to serve as a project management office for all Camp-related activities.

Description of Environmental Setting:

There are no electrical and gas lines in or near the Camp location. The removal action does not involve address, nor result in the need for substantial amounts of energy, as the project will only involve approximately 2-1/2 months of activities. All equipment runs on gasoline or diesel.

Analysis of Potential Impacts:

No current energy demand exists at the Camp. Energy will be used for lighting and the operation of a portable office utilized by the consulting firms performing the Camp investigation activities.

Temporary recreational vehicles will serve as mobile offices, portable toilets and storage buildings. Additionally, due to the remoteness of the Camp, portable electric generators will be used and communications will be via a combination of radios and cell phones.

Any solid waste material (drinking water bottles, food containers, or other material) and food scraps generated during the geophysical surveys and/or intrusive phases will be stored in plastic bags and disposed of at the motel where the team is staying. UXO fragments segregated from the investigated soil will be profiled according to hazardous waste characterization procedures and properly disposed.

Therefore, this project will not:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Require or result in the construction of new storm water drainage facilities or expansion
 of existing facilities, the construction of which could cause significant environmental
 effects.
- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.
- e. Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

- f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.
- g. Comply with federal, state, and local statutes and regulations related to solid waste.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

Findings of Significance:

	Potentially Significant Impact
	Potentially Significant Unless Mitigate
X	Less Than Significant Impact
	No Impact

17. Cumulative Effects

Project activities likely to create an impact.

Removal of the UXO -contaminated soil must be completed before industrial/commercial activities of the Camp can resume.

Description of Environmental Setting:

The Camp was assessed in an ACOE inventory progress report and Archives Search Report. Based on these documents, DTSC has determined that there are no cumulative impacts on the proposed project. Separate CEQA analysis will be performed for any additional sites when they are ready for removal or remedial action.

Analysis of Potential Impacts:

The geophysical survey and detonation of UXO are the only activities occurring at this time. No other projects are scheduled to occur within Camp Ibis. The soil samples collected will be used as a screening tool to identify the potential presence of ordnance-related contaminants in order to bias the geophysical study toward any such area. However, the sample effort will not be of the magnitude to allow for delineation of any contamination, if identified. This effort will be included in a follow-up investigation to the EE/CA effort, if warranted.

Therefore, this project will not:

- a. Increase the need for developing new technologies, especially for managing any hazardous or non-hazardous wastes that the project generates.
- b. Increase the need for developing new technologies for any other aspects of the projects.

- c. Leads to a larger project or leads to a series of projects, or is a step to additional projects. Examples of DTSC projects include Interim Corrective Measures and Removal Actions that are not final remedies for a site or facility.
- Alters the location, distribution, density or growth rate of the human population of an area.
- e. Affect existing housing, public services, public infrastructure, or creates demands for additional housing.
- f. Be cumulatively considerable on the environments with cumulative adverse effects on air, water, habitats, natural resources, etc.

References:

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.

Findings of Significance:

	Potentially Significant Impact
	Potentially Significant Unless Mitigated
\times	Less Than Significant Impact
	No Impact

18. Mandatory Findings of Significance

Project activities likely to create an impact:

The investigation/removal actions at the Camp will not have overall significant impacts.

Description of Environmental Setting:

The Camp is located within the Great Basin and sits in the Piute Valley between the Homer Mountains (west side) and the Dead Mountains (east side). The Camp is located within a large alluvial plain with both east and west areas gradually sloping up to their respective mountain ranges. The region encompassing the site is generally flat with rolling hills on both sides of Piute Wash. Piute Wash runs along the entire eastern side of the Camp while U.S. Highway 95 crosses through the flatter western half (Figure 2.2). The area is zoned for industrial/commercial use and no occupied buildings are present within at least several miles of the property. A bordering population center is Needles, 20 miles from the Camp.

Analysis of Potential Impacts:

a. Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. DTSC has determined that the project will not have a significant impact on fish or wildlife or their habitat, nor will the project eliminate important examples of the major periods of California history or prehistory. The analysis in this Initial Study supports this conclusion.

b. Have impacts that are individually limited but cumulatively considerable. As used in the subsection, "cumulatively considerable".

["Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects]

The geophysical survey and detonation of UXO are the only activities occurring at this time. No other projects are scheduled to occur within Camp Ibis. Therefore, DTSC has determined that this project will have no impacts that are individually limited but cumulatively considerable.

c. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

DTSC has determined that this project will not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly. The analysis in the Initial Study supports this conclusion.

References:

California Department of Parks and Recreation, 2002. Office of Historic Preservation. www.ohp.parks.ca.gov.

National Park Service, 2002. National Register of Historic Places. www.cr.rps.gov.

Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.

USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.

Parsons, Former Camp Ibis Draft Final EE/CA Work Plan, November 2001.

January 2001, Natural Diversity Data Base, Natural Heritage Division, California Department of Fish and Game.

Findings of Significance:

	Potentially Significant Impact
	Potentially Significant Unless Mitigated
\bowtie	Less Than Significant Impact
П	No Impact

VI. DETERMINATION OF APPROPRIATE ENVIRONMENTAL DOCUMENT

On the basis of this Special Initial Study:

☑ I find that the proposed project COULD NOT have a significant effect on the environment. A NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project COULD HAVE a significant effect on the environment, mitigation measures have been added to the project which would reduce these effects to less than significant levels. A NEGATIVE DECLARATION will be prepared.			
☐ I find that the proposed project COULD HAVE a significant effect on the environment. An ENVIRONMENTAL IMPACT REPORT will be prepared.			
	HSE	714-484-5452	
DTSC Project Manager Signature Omoruyi Patrick, P.E.	Title	Telephone #	Date
		714-484-5456	
DTSC Branch/ Unit Chief Signature John E. Scandura, Chief	e Title	Telephone #	Date

John E. Scandura, Chief Southern California Branch Office of Military Facilities

ATTACHMENT A

SPECIAL INITIAL STUDY REFERENCE LIST for Camp Ibis

- 1. California Department of Parks and Recreation, 2002. Office of Historic Preservation. www.ohp.parks.ca.gov.
- 2. National Park Service, 2002. National Register of Historic Places. <u>www.cr.rps.gov</u>.
- 3. Parsons, Site Visit Report for the Former Camp Ibis, San Bernardino, prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2000.
- 4. USACE, Rock Island District, Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Ibis (Proper), Needles, California. April 1996.
- 5. Parsons, Former Camp Ibis Draft Final EE/CA Work Plan. November 2001.
- 6. January 2001, Natural Diversity Database, Natural Heritage Division, California Department of Fish and Game.